

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NAACP, <i>et al.</i> ,	*	
	*	
Plaintiffs,	*	
	*	Case No. 1:17-cv-01427-
v.	*	TCB-WSD-BBM
	*	
BRIAN KEMP, in his official capacity	*	CONSOLIDATED
CASES		
as Secretary of State for the State of	*	
Georgia,	*	
	*	
Defendant.	*	
<hr/>		
AUSTIN THOMPSON, <i>et al.</i> ,	*	
	*	
Plaintiffs,	*	
	*	
v.	*	
	*	
BRIAN KEMP, in his official capacity	*	
as Secretary of State of the State of	*	
Georgia,	*	
	*	
Defendant.	*	

DECLARATION OF HOWE TAING

1.

My name is Howe Taing. I am over the age of 21 and legally competent to testify. I give this declaration as evidence in the above-styled action and for any other lawful purpose. I make this declaration based upon my personal knowledge of its contents.

2.

I am a Certified Computer Examiner and am employed as a Litigation Support Specialist/ E-Discovery Project Manager at Balch & Bingham LLP. I have been employed by Balch & Bingham LLP since 2009.

3.

Balch & Bingham was retained by the Georgia General Assembly's Office of Legislative Counsel to assist the Reapportionment Office and current and former members of the General Assembly respond to subpoenas in these matters.

4.

In my role as E-Discovery Project Manager for the subpoena responses, I was asked to analyze Plaintiffs' Exhibit 33, which was introduced in the deposition of Representative Joyce Chandler as Plaintiffs' Exhibit 128.

5.

Plaintiffs' Exhibit 33 consists of three pages, bates labeled GA2-001195, GA2-001197, and GA2-001198. Page GA2-001196 was omitted from the exhibit. A true and correct copy of GA2-001196 is attached hereto as **Exhibit 1**.

6.

Having reviewed each of these pages and the associated metadata that was produced for each, I can confirm that Exhibit 33 is not an accurate representation of the documents produced. Specifically, pages GA2-001197 and GA2-001198 are attachments to the omitted page GA2-001196, which is an email from Peter Combs to Dan O'Connor. Those pages are not attachments to the email represented at page GA2-001195, which is an email exchange between Dan O'Connor and Representative Joyce Chandler.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21 day of March, 2018.



Howe Taing, CCE
Litigation Support Specialist
Balch & Bingham LLP

EXHIBIT 1

From: Peter.Combs@gwinnettcountry.com
Sent: Monday, August 4, 2014 1:31 PM
To: O'Connor, Dan <dan.oconnor@legis.ga.gov>
Subject: RE: More Precinct Data
Attach: Active Voters by Race and Gender_House District 105.pdf

Dan,

Please find attached the report you requested.

Peter Combs

Elections Coordinator
Gwinnett County Department of Community Services
Voter Registrations & Elections Division
Office: 678.226.7210
Direct: 678.226.7232
Fax: 678.226.7208

From: O'Connor, Dan [<mailto:Dan.OConnor@legis.ga.gov>]
Sent: Monday, August 04, 2014 8:44 AM
To: Ledford, Lynn
Subject: More Precinct Data

Hi Lynn:

Rep. Joyce Chandler (House District 105 in Gwinnett) would like data concerning voter registration by precinct for her House district (she says that includes 9 precincts, 3 of which are "split" precincts shared with other districts). Appreciate if you could send me that info as you did last month for Rep. Tom Rice's HD 95 (same format).

Thanks,
Dan O'Connor
Reapportionment Office
(404) 656-5063